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Of Counsel

January 15, 2020

*Via ECF*

The Hon. Leda Dunn Wettre, USMJ  
United States District Court for the District of New Jersey  
MLK Jr. Fed Bldg & Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: Henderson v NY Jets  
Civ Action No. 2:17-10110(SDW)(LDW)

Dear Magistrate, Wettre:

The undersigned represents Plaintiff in the above-referenced matter. We write this letter with our adversaries' consent to request that the current deadline of January 31, 2020 to complete expert witness depositions be extended to March 4, 2020.

The depositions of Plaintiff's expert witnesses are scheduled for today and January 24, 2020. We had originally scheduled Plaintiff's expert witness Michael Lombardi's deposition for January 17, 2020 however, his wife has a medical procedure scheduled for that day. We have rescheduled the deposition for January 24, 2020.

We had scheduled Defendant's expert witness expert witness <sup>1</sup> for January 22, 2020. However, upon rescheduling Mr. Lombardi's deposition, Mr. Saravay requested and I agreed that Defendant's expert, Mr. Curran, should be rescheduled for some time after Lombardi. Mr. Curran is next available on March 4, 2020. Therefore, we ask that the deadline be extended to that date.

We plan to proceed with the settlement conference before Your Honor on February 6, 2020 in any event.

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<sup>1</sup> We are only taking the deposition of one of the two experts.

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As Mr. Saravay is in my office for the Dr. Abram's deposition, I have asked him to counter-sign this letter.

Your Honor's consideration is greatly appreciated.

Respectfully,

  
Lawrence N. Lavigne


I have read and concur with this letter:

Signed   
Adam Saravay

CC: Adam Saravay, Esq. (by ECF)

**So Ordered**

this 16<sup>th</sup> day of Jan. 2020

  
Leda D. Wettre, USMJ